

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**In re: Blue Cross Blue Shield
Antitrust Litigation
(MDL No.: 2406)**

)
)
)
)
)
)
)
)
)
)

Master File No.: 2:13-CV-20000-RDP

This document relates to all cases

**PARTIES' REPORT REGARDING
CONSOLIDATED CLASS ACTION COMPLAINT**

Pursuant to the Court's April 26, 2013 Case Management Order (Doc. #61), the parties' lead counsel have conferred about whether one consolidated complaint or two consolidated complaints should be filed. The parties have not reached agreement on this issue. However, the parties jointly propose a briefing schedule on this question whereby Plaintiffs and Defendants simultaneously file on May 14, 2013, briefs supporting their respective positions, with reply briefs due on May 20, 2013. The parties also propose that their May 14 briefs be limited to eight pages per side, and their May 20 replies be limited to five pages per side.

/s/ Joe R. Whatley, Jr.

Joe R. Whatley, Jr.

WHATLEY KALLAS, LLC

2001 Park Place North

1000 Park Place Tower

Birmingham, AL 35203

Tel: (205) 488-1200

Fax: (800) 922-4851

Email: Jwhatley@whatleykallas.com

/s/ Edith M. Kallas

Edith M. Kallas
WHATLEY KALLAS, LLC
380 Madison Avenue, 23rd Floor
New York, NY 10017
Tel: (212) 447-7060
Fax: (800) 922-4851
Email: ekallas@whatleykallas.com

/s/ David Boies

David Boies
Boies Schiller & Flexner LLP
333 Main Street
Armonk, NY 10504
Tel: (914) 749-8200
Fax: (914) 749-8300
Email: dboies@bsfllp.com

/s/ Michael D. Hausfeld

Michael D. Hausfeld
Hausfeld, LLP
1700 K. Street NW, Suite 650
Washington, DC 20006
Tel: (202) 540-7200
Fax: (202) 540-7201
Email: mhausfeld@hausfeldllp.com

/s/ David J. Zott, P.C.

David J. Zott, P.C.
Kirkland & Ellis LLP
300 North LaSalle
Chicago, IL 60654
Tel: (312) 862-2428
Fax: (312) 862-2200
Email: david.zott@kirkland.com

/s/ Daniel E. Laytin, P.C.

Daniel E. Laytin, P.C.
Kirkland & Ellis LLP
300 North LaSalle
Chicago, IL 60654
Tel: (312) 862-2198
Fax: (312) 862-2200
Email: Daniel.laytin@kirkland.com

/s/ Craig A. Hoover

Craig A. Hoover
Hogan Lovells US LLP
Columbia Square
555 13th Street, N.W.
Washington, DC 20004
Tel: (202) 637-5600
Email: craig.hoover@hoganlovells.com

/s/ Emily M. Yinger

Emily M. Yinger
Hogan Lovells US LLP
Park Place II
7930 Jones Branch Dr., Ninth Floor
McLean, VA 22102
Tel: (703) 610-6100
Email: emily.yinger@hoganlovells.com

CERTIFICATE OF SERVICE

I hereby certify that I have on this 10th day of May, 2013, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Kimberly R. West

Kimberly R. West
Wallace, Jordan, Ratliff & Brandt, L.L.C.
800 Shades Creek Parkway, Suite 400
Birmingham, AL 35209
Tel: (205) 874-0352
Fax: (205) 874-3252
Email: kwest@wallacejordan.com